

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**MOTION TO SEAL DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION TO EXCLUDE OR STRIKE
DEFENDANTS' SUPPLEMENTAL
EXPERT REPORTS AND
EXHIBITS THERETO**

In accordance with Local Rule 5.2 and the Court's Protective Order (Dkt. 32), Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two") hereby move for leave to file under seal an unredacted version of their opposition to Plaintiff James Hayden's Motion to Exclude or Strike Defendants' Supplemental Expert Reports ("Opposition") and the exhibits thereto. Take-Two has redacted from its Opposition information that was marked confidential by the parties, pursuant to the Protective Order entered in this case. Dkt. 32. Additionally, Take-Two has redacted deposition testimony that has not yet reached the deadline for designation under the Protective Order. To maintain the confidentiality of that information, therefore, Take-Two filed a public version of the Opposition that has the designated-as-confidential information redacted and seeks leave by this motion to file the unredacted version under seal.

Take-Two has served Plaintiff with the unredacted version of the Opposition and will file under seal the unredacted version when the Court grants this motion or as otherwise directed by the Court.

Take-Two explained the basis for this motion to Plaintiff, and he does not oppose it.

Dated: September 13, 2021

/s/ Dale M. Cendali

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*Attorneys for Take-Two 2K Games,
Inc. and Take-Two Interactive
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CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2021, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

Dated: September 13, 2021

/s/Dale M. Cendali

Dale M. Cendali (*pro hac vice*)

*Attorney for Defendants 2K Games, Inc. and
Take-Two Interactive Software, Inc.*